

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et  
al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION TO RESTRICT**

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Department (“PRPB”), by and through the undersigned counsel and, pursuant to Standing Order No. 9 of February 1, 2013, move the Court for an Order allowing the PRPB to file the *Motion Submitting Defendants’ Arguments in Support of Restricted Filing of Par. 241 Survey Reports* (the “Motion”) under the restricted viewing level denominated “Case Participants.”

Given the significant public interest at stake in this case, this filing is likely to attract public attention. In light of the sensitive nature – and potential repercussions in public opinion and the reform process – of the arguments contained in the Motion, the undersigned respectfully submit that it is necessary to file the same under a restricted or “Case Participants” viewing level.

WHEREFORE, the PRPB respectfully requests that the Honorable Court grant its Motion to Restrict.

CERTIFICATE OF SERVICE: It is hereby certified that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record which are CM/ECF system participants

at their corresponding e-mail addresses and which, pursuant to Local Civil Rule 5.1(b)(2), constitutes the equivalent service.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27<sup>th</sup> day of January, 2020.

**McCONNELL VALDÉS LLC**  
**P.O. Box 364225**  
**San Juan, Puerto Rico 00936-4225**  
**Tel: (787) 250-5632**  
**Fax: (787) 759-8282**

s/ Arturo J. García-Solá  
Arturo J. García-Solá  
USDC-PR No. 201903  
[ajg@mcvpr.com](mailto:ajg@mcvpr.com)

s/ Lizzie M. Portela-Fernández  
Lizzie M. Portela Fernández  
USDC-PR No. 208401  
[lpf@mcvpr.com](mailto:lpf@mcvpr.com)

s/ Sonia M. López del Valle  
Sonia M. López del Valle  
USDC-PR No. 231413  
[sld@mcvpr.com](mailto:sld@mcvpr.com)

*Counsel for Defendants*